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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS EMILY ROSENBERG TO PUBLIC REPRESENTATIVE INTERROGATORY (PR/USPS-T3-28)

The United States Postal Service hereby files the response of witness Emily Rosenberg to the above-listed interrogatory of the Public Representative dated March 8, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG TO PUBLIC REPRESENTATIVES' INTERROGATORY

PR/USPS-T-3-28

The general topic of this question is the Microsoft Scoring Tool provided in the Library Reference USPS-LR-N2012-1/14, file "14_Mail Processing Window Scoring Tool.xls." The aim of this question is to replicate the Postal Service witness's results using this tool. Please refer to your response to GCA/USPS-T3-36 where you state: "The six point scale is binary. If any one factor failed the scenario was considered infeasible." Please also refer to your response to GCA/USPS-T3-1 (c) where you state: In addition, to replicate the exact results you need to ensure that all assumptions are identical. You can use the tool two ways: perform one-off assumption changes or have it run through multiple iterations. The 6,371.56 is a result of an earlier run where the iteration function was used. The 6,872.70 is based on the assumptions currently saved in the model. That value resides in cell N46, on the calculations tab, prior to making any adjustments. Thus, they do not match because you are not comparing the 'like' scenarios.

a. Please confirm that the "like" scenarios, as referenced in the above-referenced answer, mean scenarios based on identical assumptions. If not confirmed, please provide the definition for "like" scenarios.
b. Please provide an example (specifically identifying the data or cell to manipulate and other steps) of using the tool to:
    i. perform a "one-off assumption change" to generate results.
    ii. "run through multiple iterations" to generate results.
c. When generating the results in the scoring tool, using all the assumptions exactly as saved in the model provided in the Library Reference USPS-LRN2012-1/14 (file "14_Mail Processing Window Scoring Tool.xls") there appears to be a feasibility issue. The annual cost savings shown in worksheet 'Results', cell 'R5' are equal to 6,872.7, which is consistent with your answer quoted above. However, after generating the results, one of the six binary scales ('Last Outgoing Trip Arrives before Incoming CET') changed from 'True' to 'False' (worksheet 'Calculations', cell 'E51'). The overall feasibility also changed to 'False' (worksheet 'Calculations, cell 'C49'). Docket No. N2012-1 - 3 - Please confirm that the scenario currently saved in the model and presented in the file "14_Mail Processing Window Scoring Tool.xls" is infeasible. If confirmed, please explain the assumption or value that causes such infeasibility. Also, please provide a version with saved assumptions that generates a feasible scenario resulting in 6,872.70 total savings.
    i. If not confirmed, please explain why the scenario, using the assumptions saved in the model, generates an infeasible result. *See* Library Reference USPS-LR-N2012-1/14 (worksheet 'Assumptions', file "14_Mail Processing Window Scoring Tool.xls").
    ii. If not confirmed, please explain in detail the steps in the process needed to replicate the feasible results using the scoring tool with assumptions as saved in the file submitted in USPS-LR-N2012-1/14

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RESPONSE to PR/USPS-T3-28

(a) Confirmed.

(b) Change the value of Cell K17 on the assumptions tab to 12. This reduces the iterations that will be run from 220 to 140 when the "Generate Iterations Results" button as shown in N12.

(c) Not confirmed. The final scenario run in the tool is infeasible, but the feasible solution is within the range of iteration run by the tool. The feasibility is calculated for each iteration run. If you set cancellation window to 12 hours, feasibility is True and the savings within the tool are $6,872.70.